## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

THE DIRECT MARKETING ASSOCIATION, INC.'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO THE UNITED STATES POSTAL SERVICE (DMA/USPS-1)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached first set of interrogatories and requests for production of documents to the United States Postal Service (DMA/USPS-1): If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

Allella Deiglale Dana T. Ackerly II, Esq.

David L. Meyer

Michael D. Bergman

**COVINGTON & BURLING** 

1201 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

(202) 662-5296

Counsel for the Direct Marketing Association, Inc.

September 12, 1997

DMA/USPS-1. Please refer to your response to ABP/USPS-T4-11 (redirected from witness Moden).

- a. Please provide all data in an electronic spreadsheet relating to the "informal survey" conducted by the Postal Service to determine how many barcoded pieces may be expected in the test year if bar code readers are affixed to FSM 1000 equipment. If the Postal Service considers such information to be confidential, please describe the results of the survey in general and provide the data subject to a protective order.
- b. Please identify the Postal Service witness who is responding to this interrogatory.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 (section 3001.12) of the Postal Rate Commission's Rules of Practice and Procedure and Rule 3 of the Commission's Special Rules of Practice in this proceeding.

Michael D. Bergman

September 12, 1997